

STATE OF INDIANA                    )  
   ) SS: LAKE CIRCUIT/SUPERIOR COURT  
 COUNTY OF LAKE                    ) CIVIL DIVISION  
   ) \_\_\_\_\_, INDIANA

ANDREA PALMER and  
 EDWARD DEVEN,

Plaintiffs,

-vs-

LARRY BLOOD, JR. and U.S.  
 BULK TRANSPORT, INC.

Defendants.

45C01-1908-CT-000817

CAUSE NO.:

### COMPLAINT FOR DAMAGES AND JURY DEMAND

Comes now the Plaintiffs, Andrea Palmer and Edward Deven, by counsel and for their claim against the defendants, Larry Blood, Jr. and U.S. Bulk Transport, Inc. states as follows:

1. On August 9, 2017, at approximately 10:50 a.m., the plaintiffs, Andrea Palmer and Edward Deven, were in a motor vehicle stopped southbound on Burr Street near I-80 at a stop light in Gary, Lake County, Indiana.

2. At said time and place, the Defendant, Larry Blood, Jr., was operating a tractor trailer southbound on Burr Street when he collided with the rear of the vehicle occupied by plaintiffs.

3. The Defendant, Larry Blood, Jr.'s, negligent conduct includes, but is not limited to the following:

- a. Failing to keep a proper lookout;
- b. Driving at an unreasonable speed for the conditions;
- c. Failing to keep a proper distance between his tractor trailer and the vehicle in front of him; and

- d. Starting his vehicle from a stop position when it was not safe to do so; and
- e. Driving in such a manner as to cause the collision.

4. Defendant, Larry Blood, Jr., was an agent and/or employee of Defendant, U.S. Bulk Transport, Inc. and was acting in the course and scope of his agency and/or employment at the time of the collision, so as to make Defendant, U.S. Bulk Transport, Inc. liable for the acts of its agents and/or employees.

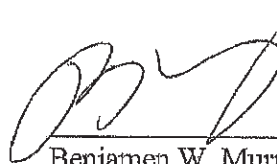
5. Regardless of the relationship between Defendants, Larry Blood, Jr. and U.S. Bulk Transport, Inc., Defendant, U.S. Bulk Transport, Inc., was the owner of the USDOT number displayed on the tractor trailer involved in this collision and is therefore liable for the acts of the driver of that tractor trailer.

6. As a direct and proximate cause of the Defendants' negligent conduct, the Plaintiffs, Andrea Palmer and Edward Deven, suffered injuries, some of which are permanent, suffered a loss of wages, suffered property damage, incurred expenses for medical care, testing and treatment, suffered physical and mental pain and suffered an inability to engage in their normal daily activities for an indefinite period of time.

WHEREFORE, the Plaintiffs, Andrea Palmer and Edward Deven, demand judgment against the Defendants, Larry Blood, Jr. and U.S. Bulk Transport, Inc., and requests the following relief:

1. Reasonable compensatory damages;
2. Costs of this action; and
3. For all other just and proper relief.

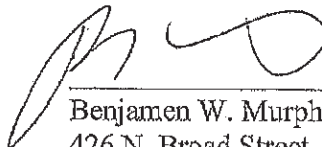
Respectfully submitted,



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**PLAINTIFFS DEMAND TRIAL BY JURY.**

Respectfully submitted,



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